

## Appendix C: Overview of Google's agreements with OEMs and MNOs

- C.1 As set out in this Proposed Decision (see 'Competition for OEMs' and 'Barriers to entry and expansion for alternative app stores within Google's Mobile Ecosystem'), a third-party Original Equipment Manufacturer (**OEM**) must enter into a series of agreements with Google if they wish to (i) use the Android operating system, (ii) install the Play Store or at least one of Google's other first party apps and (iii) be eligible to receive payments from Google. In addition, Google has entered into a number of revenue sharing agreements with Mobile Network Operators (**MNOs**) in the UK.
- C.2 In this Annex we provide a more detailed description of Google's agreements with OEMs and MNOs. In particular, we set out our analysis of:
- (a) Google's agreements with the largest third-party OEMs in the UK by the number of mobile devices sold/activated ([REDACTED]). These OEMs cover the vast majority of Android mobile devices distributed in the UK.<sup>1</sup> We also assess Google's revenue sharing agreements with the major MNOs in the UK;<sup>2</sup> and
  - (b) the revenue earned by OEMs through these agreements.
- C.3 This Annex is structured as follows:
- (a) First, we set out an overview of the different types of distribution, licensing and revenue sharing agreements that Google has with OEMs. We explain the relationship between those agreements, alongside a description of the key terms of those agreements. We also set out a high-level description of the key elements of Google's revenue sharing agreements with MNOs; and
  - (b) Second, we set out a breakdown of the financial compensation paid by Google to OEMs under the placement agreements and revenue sharing agreements.

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<sup>1</sup> Google provided its agreements with the following OEMs which we have reviewed: [REDACTED]

<sup>2</sup> Google also provided the following agreements with MNOs which we have also reviewed: [REDACTED]

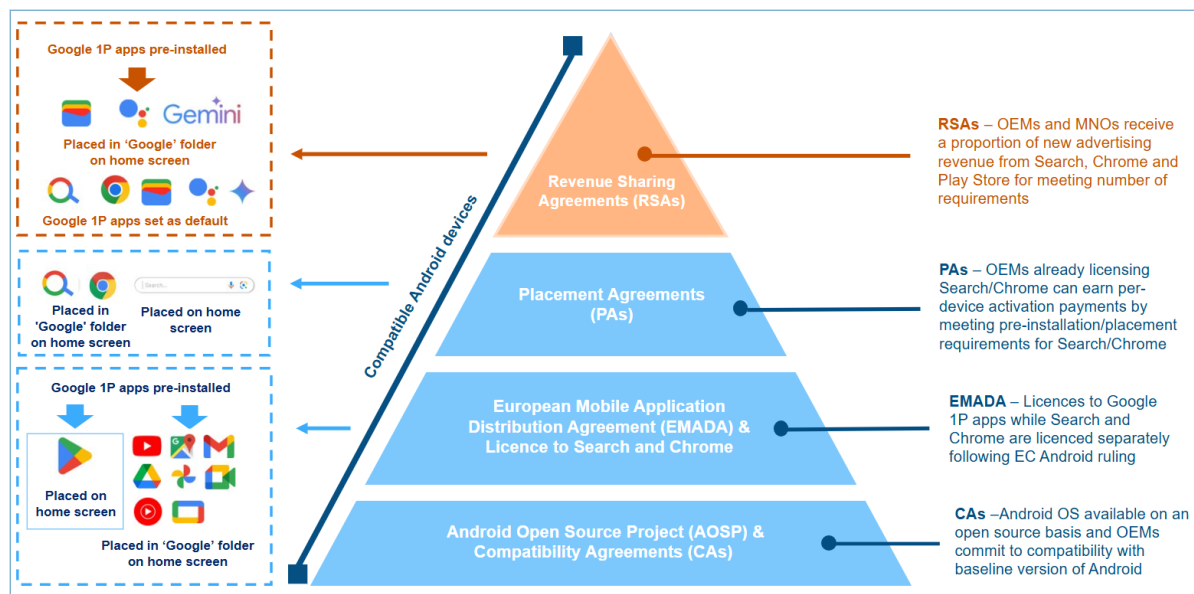
## Overview of Google's distribution and licensing agreements

- C.4 In this section, we consider the following types of agreements that Google has with OEMs and MNOs: the Android Compatibility Commitment (**ACC**), the European Mobile Application Distribution Agreement (**EMADA**), the Placement Agreements (**PAs**) and Revenue Sharing Agreements (**RSAs**).
- C.5 Entering into PAs and RSAs is dependent on being party to other agreements, including the ACC and EMADA, as follows:
- (a) While the Android operating system is based on open-source software, to license the Android name and logo, OEMs must enter into the ACC and comply with the definition of the Android operating system set out in the Compatibility Definition Document (**CDD**).
  - (b) OEMs that have entered into the ACC and comply with the CDD can then enter into the EMADA. Under this agreement, OEMs pay Google a per-device licence fee to license a collection of Google apps and services. OEMs can also choose to license the Google Search app and/or Google Chrome apps through separate licences.
  - (c) OEMs that have entered into the ACC, CDD, the EMADA and Google Search and Chrome licences, are then eligible to enter into a PA and/or an RSA.<sup>3</sup>
- C.6 Figure C.1 contains an overview of each of the different types of agreement that Google has in place with OEMs and MNOs and the relationship between those agreements.

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<sup>3</sup> See also Mobile Browsers and Cloud Gaming MI [Final Decision Report](#), Appendix B paragraphs 5-11, dated 12 March 2025.


**Figure C.1: Overview of Google's agreements with OEMs and MNOs**



Source: Illustration created by the CMA, [[

## Android Open Source Project and the Android Compatibility Commitment

- C.7 The Android operating system is based on open-source software and was originally developed by the Open Handset Alliance, a consortium of 84 technology companies, with the objective of developing open standards for mobile devices. Android is currently commercially sponsored by Google, which makes Android available for free via the Android Open Source Project (AOSP), a publicly available project that provides the source code for Android. Google submitted that this means anyone can take the source code, modify it, and build on it.<sup>4</sup>
- C.8 The majority of Android mobile devices are manufactured by third-party OEMs who license the 'Android' trademarks from Google. In order to use the Android brand to market a device, Google requires OEMs to agree to the ACC under which OEMs agree to maintain compatibility with a baseline version of Android as set out in the CDD. Google submitted that the CDD sets out basic technical and compatibility requirements such as that the device must have at least one

<sup>4</sup> [CMA Mobile Ecosystem Market Study Final Report](#) dated 10 June 2022, Appendix E paragraph 3. [Open Handset Alliance.

display, include a microphone and audio output, have a minimum screen size, and implement basic security features.<sup>5</sup> Google submitted [REDACTED].<sup>6</sup>

- C.9 We use the term Android in this annex to describe all versions of the Android mobile operating system which comply with the ACC.

### **European Mobile Application Distribution Agreement**

- C.10 If an OEM wants to license Google's first party apps, commonly known as GMS, on its mobile devices to be distributed in the UK, it must enter into the EMADA with Google. To enter into the EMADA, an OEM must have first agreed to the ACC.
- C.11 The EMADA permits OEMs to pre-install a suite of Google first party apps on their mobile devices and OEMs do so on a device-by-device basis.<sup>7</sup> Under the terms of the EMADA, OEMs agree to pre-install and place on the home screen (i) the Play icon, and (ii) a folder labelled 'Google' containing the following Google apps: Gmail, Maps and YouTube. In addition, OEMs have the option to pre-load other Google apps, such as [REDACTED].<sup>8,9</sup> In return, OEMs pay Google a licence fee for each device distributed with Google applications. The amount of this fee varies depending on device type, certain device characteristics and activation location.<sup>10</sup>
- C.12 The EMADA does not include licences for the Google Search app or the Chrome browser which are licensed and distributed under separate licence agreements following the European Commission's Android decision.<sup>11</sup> These agreements grant the OEM a licence to pre-install the Google Search app and/or the Chrome app on a device-by-device basis (meaning an OEM can pre-install these apps on all, some, or none of its mobile devices). These licences

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<sup>5</sup> Google's response to section 69 notice [REDACTED]

<sup>6</sup> Google's response to section 69 notice [REDACTED]

<sup>7</sup> Note of meeting with Google [REDACTED]

<sup>8</sup> Note of meeting with Google [REDACTED]

<sup>9</sup> OEMs also get access to Google Play Services, which Google stated are included on all Google supported Android devices. See Google's response to the CMA's information request [REDACTED]

<sup>10</sup> Google's response to section 69 notice [REDACTED]

<sup>11</sup> Case AT.40099 Google Android, European Commission Decision, 18 July 2018. Pending appeal to the Court of Justice of the European Union.

do not contain any placement or default requirements.<sup>12</sup> There are no fees associated with these licenses.<sup>13</sup>

## Placement Agreements

- C.13 OEMs that have entered into the ACC, the EMADA, and the Google Search and Chrome licences, are then eligible to enter into a PA. We have reviewed the PAs provided by Google and in respect of which, Google has stated that [REDACTED].<sup>14</sup>
- C.14 Under the PAs, Google pays OEMs ‘activation payments’ for each device on which the OEM fulfils obligations related to the pre-loading and placing of Google Search and/or Chrome.
- C.15 The pre-loading and placement requirements in the PAs are that OEMs must place, and hence pre-load, (i) the Google Search widget on the default home screen; and (ii) either the Google Search App only or both the Google Search and Chrome apps in a Google folder on the default home screen, if not more prominently.<sup>15</sup>
- C.16 In return, Google pays an OEM an activation payment for each device on which the OEM satisfies the above requirements including a higher activation payment if the OEM abides by the placement obligations in relation to Google Search and Chrome.<sup>16</sup> Based on our review, in one of the PAs [REDACTED].<sup>17</sup>
- C.17 Google submitted that the PAs do not concern the placement of other apps (ie other than Google Search and Chrome), nor do they prevent OEMs from having additional deals with other app developers.<sup>18</sup>

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<sup>12</sup> Google’s response to the CMA’s information request [REDACTED].

<sup>13</sup> MBCG MI Final Decision Report, Appendix B paragraph 10, dated 12 March 2025.

<sup>14</sup> See Google’s response to the CMA’s information request [REDACTED]; see also MBCG MI Final Decision Report, Appendix B paragraphs 42 to 52, dated 12 March 2025.

<sup>15</sup> Google’s response to section 69 notice [REDACTED]; See also Google’s response to the CMA’s information request [REDACTED].

<sup>16</sup> Google’s response to the CMA’s information request [REDACTED].

<sup>17</sup> See for example Google’s response to the CMA’s information request [REDACTED].

<sup>18</sup> Note of meeting with Google [REDACTED].

## Revenue Sharing Agreements

- C.18 An OEM may also enter into an RSA with Google, either instead of or in addition to a PA. The CMA has reviewed the RSAs entered into between Google and the following Android OEMs: [REDACTED]. Together these account for the vast majority of Android mobile devices distributed in the UK.<sup>19</sup> Provided that they have entered into the EMADA (and, if applicable, the Google Search and Chrome licenses), OEMs can then enter into an RSA.<sup>20</sup>
- C.19 Google submitted that its RSAs [REDACTED] and that, [REDACTED], RSAs are [REDACTED], [REDACTED].<sup>21</sup>
- C.20 RSAs typically include two or more ‘tiers’ of requirements, with OEMs earning more by meeting the additional requirements in higher tiers. [REDACTED] meaning an OEM can decide to apply the requirements of these higher tiers on all, some, or none of its mobile devices.<sup>22</sup> [REDACTED].
- C.21 Within these tiers, OEMs can obtain<sup>23</sup> [REDACTED].
- C.22 The Google apps that are subject to promotional requirements under the RSAs vary according to the OEM but they typically include: Photos, Meet, Duo, Keyboard, NearbyShare, Google Wallet, Google One, Google Pay, Google Search, Chrome and Google Assistant. Google submitted that the RSAs do not typically have promotional requirements related to Google Play, YouTube, Google Maps, Google Drive, or Gmail.<sup>24</sup>
- C.23 In the following sub-sections we have summarised the key promotional requirements within the RSAs we have reviewed. Our summary is not intended to be exhaustive and we focus on the clauses related to the promotion of Google’s Mobile Platform (ie Android, the Play Store and the Chrome browser).

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<sup>19</sup> Google’s response to the CMA’s information request [REDACTED]. Google also submitted [REDACTED].

<sup>20</sup> See for example [REDACTED].

<sup>21</sup> Google’s response to the CMA’s information request [REDACTED].

<sup>22</sup> Google’s response to the CMA’s information request [REDACTED].

<sup>23</sup> Google’s response to the CMA’s information request [REDACTED].

<sup>24</sup> Google’s response to the CMA’s information request [REDACTED].

## Pre-installation clauses under the RSAs

- C.24 Our review of OEM RSAs that account for a large majority of UK Android users indicates that these RSAs have requirements, in various forms, related to the pre-installation of the various Google apps as listed in paragraph C.22.
- C.25 As regards Google Pay / Wallet, Google submitted that there are optional tiers in the OEM RSAs under which OEMs can receive, on a device-by-device basis, one-off payments for the sole pre-installation of this app on the mobile device.<sup>25</sup> The CMA's review has found that this sole pre-installation requirement for some OEMs can also apply to other functional apps, such as Google One or Find My Device.<sup>26</sup> [REDACTED].<sup>27</sup>
- C.26 Google stated that the RSAs in the UK do not contain any pre-installation requirements regarding the Play Store or third-party app stores.<sup>28</sup> However, requirements related to the pre-installation and placement of the Play Store are covered by the EMADA.

## Placement clauses under the RSAs

- C.27 Our review of OEM RSAs that account for a large majority of UK Android users indicates that these RSAs have requirements, in various forms, related to the placement of various Google and non-Google apps.
- C.28 For example, some RSAs contain clauses that require the OEM, in order to qualify for certain higher tiers on a device-by-device basis, to place Chrome in the 'hotseat' of a mobile device.<sup>29</sup>
- C.29 Our review also indicates that some RSAs contain clauses stipulating where certain third-party browsers and third-party alternatives to Google Search can be placed on a mobile device distributed in the UK.<sup>30</sup> Google stated that in

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<sup>25</sup> Google's response to the CMA's information request [REDACTED]

<sup>26</sup> See for example [REDACTED].

<sup>27</sup> Google response to CMA's information request [REDACTED].

<sup>28</sup> Google's response to section 69 notice [REDACTED]

<sup>29</sup> The RSAs use the term application dock to refer to the collection of applications on the bottom row of the default home screen which is also visible in the same location and format on all screens (except on the minus one screen). It is also known as the hotseat. Google's response to section 69 notice [REDACTED]. Google's response to section 69 notice [REDACTED]. Google's response to section 60 notice [REDACTED]. Google's response to section 69 notice [REDACTED]. Google's response to section 69 notice [REDACTED]; Google's response to section 69 notice [REDACTED].

<sup>30</sup> Google's response to section 69 notice [REDACTED]. Google's response to section 69 notice [REDACTED]; Google's response to section 69 notice [REDACTED] Google's response to section 69 notice [REDACTED]; Google's response to section 69 notice [REDACTED].

some of the RSAs, there are provisions whereby, [REDACTED].<sup>31</sup> The CMA's review has found that there are similar provisions in some of the RSAs applicable to where alternatives to Google Search can be placed on a mobile device distributed in the UK.

### **Default clauses under the RSAs**

- C.30 Our review of OEM RSAs that account for a large majority of UK Android users indicates that these RSAs have requirements, in various forms, related to the setting of various Google apps as the device default.
- C.31 For example, some of the RSAs contain clauses requiring the OEM to set Chrome as the default browser, on a device by device basis, in order to qualify for payments under the higher tiers.<sup>32</sup>

### **RSAs with MNOs**

- C.32 Google submitted that it does not have any EMADA agreements or PAs in place with MNOs due to the fact that MNOs are not mobile device manufacturers.<sup>33</sup>
- C.33 However, Google has entered into RSAs with major MNOs in the UK. The CMA has reviewed the RSAs Google has entered into with the following major UK MNOs: [REDACTED]. The terms of these RSAs are similar to the terms of Google's OEM RSAs which we have reviewed in that they allow the MNOs to promote Google's apps and services on a device-by-device basis in return for a share of Google's net advertising revenue.<sup>34</sup>
- C.34 As regards payment of revenue to the MNOs, Google stated that [REDACTED].<sup>35</sup>

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<sup>31</sup> Minus One Screen refers to the screen accessible to the left of the default home screen. Google's response to section 69 notice, [REDACTED]

<sup>32</sup> Google's response to section 69 notice [REDACTED]. Google's response to section 69 notice [REDACTED]. Google's response to the CMA's information [REDACTED]; Google's response to section 69 notice [REDACTED]; Google's response to section 69 notice[REDACTED]; [REDACTED]; Google's response to section 69 notice[REDACTED];..

<sup>33</sup> Google's response to section 69 notice[REDACTED].

<sup>34</sup> Note of [REDACTED].

<sup>35</sup> Google's response to section 69 notice [REDACTED].



## Other agreements – Gemini

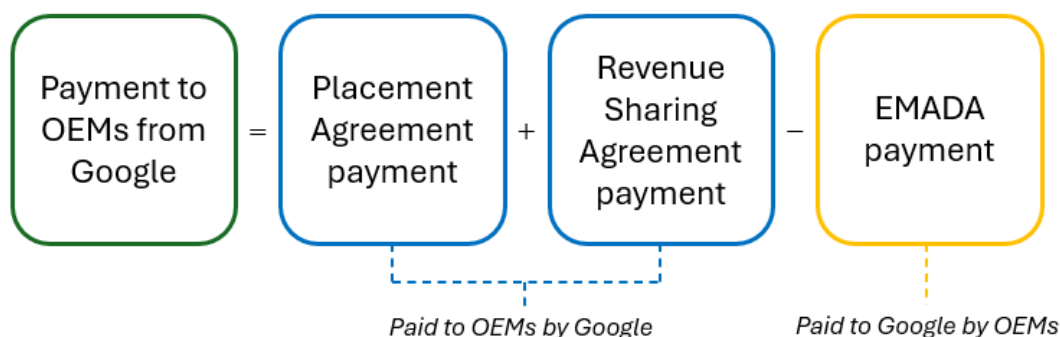
C.35 In addition to the above agreements, OEMs may also licence the Gemini Assistant through the EMADA on their mobile devices. [REDACTED].<sup>36</sup> Under Samsung’s Gemini agreement with Google, in return for Samsung promoting Gemini on its mobile devices, which Samsung may do on a device-by-device basis, Samsung receives various financial benefits [REDACTED].<sup>37</sup>

## Financial compensation for agreements

C.36 This section sets out our current understanding of the payments made between Google and Android OEMs as a result of the agreements outlined above.

C.37 As summarised in Figure C.2 below, Google receives payments from OEMs who license Google apps through the EMADA and then makes payments to OEMs that enter into PAs and/or RSAs, such that, overall, OEMs can receive a net payment from Google.

**Figure C.2: Payments that can be made and received by OEMs**



CMA analysis based on Google’s response to section 69 notice [REDACTED] and CMA analysis based on Google’s response to section 69 notice [REDACTED].

C.38 As noted earlier in this Annex, Google also enters into RSAs with OEMs and MNOs. However, MNOs account for only a small percentage of mobile device

<sup>36</sup> Google’s response to section 69 notice [REDACTED]. Google’s response to section 69 notice [REDACTED]. Google’s response to section 69 notice, [REDACTED]; Google’s response to section 69 notice, [REDACTED] Google’s response to section 69 notice [REDACTED].

<sup>37</sup> Samsung response to the CMA’s information request [REDACTED].

configurations in the UK and EEA.<sup>38</sup> As such, our financial analysis focuses on the payments between Google and OEMs.

- C.39 Table C.1 below sets out our understanding of the payments made between Google and five OEMs which comprise the majority of active UK Android smartphones in 2024, under the agreements shown in Figure C.2 above.<sup>39</sup> Each of these OEMs had a PA and RSA with Google, and therefore at the very least the OEMs comprising the majority of active UK Android smartphones in 2024 are party to PAs and RSAs with Google.<sup>40</sup>
- C.40 Based on our analysis, Google made substantial net positive payments to each OEM when all three types of payment are considered.<sup>41</sup>

**Table C.1: Annual payments between Google and the top 5 Android OEMs under EMADA, PAs, RSAs (UK, 2024)**

OEM	EMADA payment (from OEM)	PA payment (to OEM)	RSA payment (to OEM)*	£ Net payment (to OEM)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Source: CMA analysis [REDACTED].<sup>42</sup>

**EMADA and PAs**

- C.41 This sub-section covers the activation payments made between Google and OEMs under the EMADA and the PAs.
- C.42 The payment rates for mobile devices activated in the UK on or after 1 February 2024 for each device tier for the EMADA and the PAs are shown in Table C.2 below.

<sup>38</sup> Google’s response to section 69 notice [REDACTED].<sup>38</sup>  
<sup>39</sup> CMA analysis [REDACTED]  
<sup>40</sup> According to CMA analysis of Statcounter data ([Mobile Vendor Market Share United Kingdom | Statcounter Global Stats](#)), these five OEMs accounted for around 75% of Android smartphones in 2024. [REDACTED].  
<sup>41</sup> CMA analysis [REDACTED]  
<sup>42</sup> Google’s response to section 69 notice [REDACTED]

**Table C.2: Google’s activation payment rates by device tier, UK (for devices activated on or after 1 February 2024)**

Agreement type	£			
	Tier 1	Tier 2	Smartphones Tier 3	Tablets
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Source: CMA analysis [REDACTED].

- C.43 Based on these payment rates, OEMs that comply with the terms in the PA relating to both Google Search and Chrome (as opposed to just the terms in the PA relating only to Google Search) would be able to secure sufficient payments to recoup the per device licence fees paid under the EMADA.
- C.44 The annual payments data presented in Table C.1 earlier in this section indicates that all five OEMs for which we received payments data (at least) recouped their EMADA fee through the payment they received from Google under their PA. This suggests that these OEMs comply with the terms in the PA relating to both Google Search and Chrome.
- C.45 In particular, Table C.1 shows that:
- (a) Overall, in 2024 Google paid out at least as much in total PA activation payments in the UK to these OEMs (approximately [£0 – 500 million] [REDACTED])<sup>43</sup> as it received in total UK EMADA licensing revenues from these OEMs (approximately [£0 – 500 million] [REDACTED])<sup>44</sup>.
  - (b) Individually, each OEM that featured in our analysis received slightly larger or equal PA payments compared to the EMADA licensing fees they paid to Google in the UK in 2024.<sup>45</sup>
- C.46 It follows from the above that, if they comply with the relevant requirements, the PA allows OEMs to attract substantial payments from Google and these appear to be set at a level which allows them to entirely recoup the payments they make to Google under the EMADA. The PA payments therefore provide a substantial financial incentive to promote Chrome and Google Search.

<sup>43</sup> CMA analysis of Google’s response to section 69 notice [REDACTED].  
<sup>44</sup> CMA analysis of Google’s response to section 69 notice [REDACTED].  
<sup>45</sup> CMA analysis of Google’s response to section 69 notice [REDACTED].

RSAs

- C.47 This sub-section covers the payments received by OEMs from Google under the RSAs.
- C.48 The terms and requirements of the RSAs vary across OEMs. As covered in more detail in the ‘Revenue Sharing Agreements’ section, the RSA requirements are split across tiers. [redacted], meaning an OEM can decide to apply the requirements of these higher tiers on all, some, or none of its mobile devices. OEMs can earn more by meeting the additional requirements in higher tiers.<sup>46</sup>
- C.49 An example of the payments available to OEMs under an RSA with Google are set out in Table C.3 below.

Table C.3: Google’s RSA payments available to an OEM by device tier, UK, in 2024<sup>47</sup>

Device Configuration Tier	Flat payment per device activated	Share of Net Ad Revenue payable	Share of Net Play Transaction Revenue payable
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]		[redacted]	[redacted]
[redacted]		[redacted]	[redacted]
[redacted]		[redacted]	[redacted]

Source: CMA analysis [redacted].

\*[redacted].

†[redacted].

- C.50 The annual payments data presented in Table C.1 earlier in this section indicates that all five of the OEMs for which we received payments data received [redacted] payments from Google under their RSAs in the UK. In particular, Table C.1 shows that:
- (a) Overall, Google estimated that it paid approximately [£0 – 500 million] [redacted] in the UK under RSAs to these OEMs in 2024.<sup>48</sup>
- (b) Individually, each of these OEMs received [redacted] payments in the UK under their RSAs in 2024.<sup>49</sup>

<sup>46</sup> For more explanation, see Revenue Sharing Agreements within the Overview of Google’s distribution and licensing agreements section earlier in this Annex.

<sup>47</sup> [redacted]. CMA analysis [redacted]

<sup>48</sup> CMA analysis [redacted]

<sup>49</sup> CMA analysis [redacted]

C.51 It follows from the above that the RSA creates a substantial financial incentive for OEMs to (i) promote Google’s apps and services on their mobile devices, and (ii) use the Android operating system (as the RSA is conditional on joining the EMADA).

## Overall assessment

C.52 Our analysis set out in the above sub-sections indicates that the agreements between Google and Android OEMs result in substantial net positive payments to OEMs in the UK. This is based on our findings that each of the five OEMs featured in our analysis (i) (at least) recouped their EMADA fee through the payment they received from Google under their PA, and (ii) is estimated to have received substantial payments from Google under their RSAs. [REDACTED]<sup>50</sup>

C.53 Our analysis also showed that some OEMs received a much larger net payment than others. For example, we found that in 2024 [REDACTED] accounted for the majority of PA and RSA payments made to the OEMs included in our analysis. [REDACTED]<sup>51, 52, 53, 54, 55, 56</sup>

C.54 It therefore follows from our analysis that the agreements between Google and Android OEMs create substantial financial incentives for OEMs to (i) promote Google’s apps and services on their mobile devices, and (ii) use the Android operating system (as the RSA is conditional on joining the EMADA). As explained in Chapter 6, this creates a barrier to entry and expansion in providing a competing Mobile Platform.<sup>57</sup>

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<sup>50</sup> CMA analysis of Google’s response to section 69 notice [REDACTED].

<sup>51</sup> CMA analysis of Google’s response to section 69 notice [REDACTED]

<sup>52</sup> CMA analysis [REDACTED] and Google’s response to section 69 notice [REDACTED]

<sup>53</sup> CMA analysis of Statcounter data ([Mobile Vendor Market Share United Kingdom | Statcounter Global Stats](#)).

<sup>54</sup> CMA analysis [REDACTED].

<sup>55</sup> CMA analysis [REDACTED]

<sup>56</sup> CMA analysis [REDACTED]

<sup>57</sup> See the Barriers to entry and expansion in Mobile Platforms section in Chapter 6.